



UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA)	
)	
v.)	NO. 2:19-CR-00010
)	
)	JUDGE CAMPBELL
GILBERT GHEARING)	

UNITED STATES' MOTION FOR LEAVE
TO FILE MOTION *IN LIMINE* PAST THE COURT-IMPOSED DEADLINE

The United States of America, by its attorneys Thomas J. Jaworski, Attorney for the United States Acting Under Authority Conferred by 28 U.S.C. § 515, and Sarah K. Bogni, Juliet Aldridge, and Amanda J. Klopff, Assistant United States Attorney, hereby moves for leave to file its motion *in limine* after the deadline set by the Court. In support of such motion, the United States submits the following:

1. On February 3, 2023, the Court issued an order related to the scheduling of matters in this case, which provided in relevant part that by February 7, 2023, the parties should file motions concerning matters not previously addressed. (DE 1131).
2. On August 15, 2022, the United States provided the defendant with a production specific to business records certifications, which included the bulk of the certifications in the attached motion.
3. On September 3, 2022, the United States sent a set of proposed stipulations to the defendant that included reference to the business records. The Defendant declined to accept the stipulation.